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May 14, 2021

So ordered.

**VIA ECF**

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

/s/ Hon. Alvin K. Hellerstein  
May 17, 2021

RE: Y.G., individually and on behalf of C.T. v. N.Y.C. Dep't of Educ.  
1:21-cv-00641 (AKH)

Dear Judge Hellerstein,

I am the attorney for the Plaintiffs in the above-referenced action, wherein Plaintiff seeks attorneys' fees incurred in the administrative proceeding under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as the instant federal action, and a claim for implementation of relief awarded to Plaintiff as a result of the administrative proceeding.

The parties do not anticipate any discovery in this matter, as the Plaintiff has already provided the Defendant with billing invoices for the claim for attorneys' fees and costs.

I write jointly with Defendant's counsel to propose a briefing schedule pursuant to the Court's April 7, 2021, Scheduling Order (Docket No. 10). As the parties have made significant progress towards resolving the issue of implementation and remain optimistic that this matter will be resolved through settlement, the parties jointly propose that the Court adjourn the pretrial conference scheduled for May 21, 2021, *sine die* and order the following briefing schedule:

- Plaintiff's motion for summary judgment will be due on August 23, 2021.
- Defendant's opposition will be due on September 13, 2021.
- Plaintiff's reply will be due on September 22, 2021.

The briefing schedule proposed above will afford the parties additional time for settlement negotiations and to resolve the issue of implementation.

At this time, the parties believe that they can resolve the matter without Court intervention and submit that referral to the Magistrate Judge for a settlement conference is not currently necessary. However, in the event the parties reach a point where they agree that such a conference may aid and advance settlement, the parties will submit a letter to the Court requesting that the matter be referred to the Magistrate Judge for a settlement conference.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

s/ Erin E. Murray

cc: Philip Frank (via ECF)  
Attorney for the Defendant